

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF V.S.

DECLARATION OF V.S.

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, V.S., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am choosing to use initials for myself out of fear and the desire to protect myself
5 and my family, so I am choosing to remain anonymous.

6 3. I am an 18-year-old high school senior, and I live with my parents in Washington
7 state. I am non-binary and receive gender-affirming care in the form of hormone replacement
8 therapy (HRT). I am currently taking some college classes, robotics, engineering, and
9 automotive classes. I really enjoy technology and technical things. Last year, my Technology
10 Student Association team placed 3rd in a national competition, and I am currently working on a
11 drone for this year's contest.

12 4. I was 13 years old when COVID hit, and I had a lot of time to myself to think
13 about my identity and who I was. It was a very hard time for me because I was very depressed,
14 and that affected my parents too because they could see that I was unhappy. We didn't really
15 know what else to do besides therapy, so I started seeing a therapist, which helped.

16 5. Through therapy I started thinking about my own identity. Eventually, towards
17 the end of spring 2021, I decided I had to change everything about my life. I wanted to get away
18 from my current identity. I had been contemplating suicide and couldn't figure out what was
19 "wrong" with me. I stopped doing my previous activities like baseball and didn't want to go out
20 as much. I didn't really know what I wanted to do yet, but I knew I needed to change things and
21 get to a better spot with my mental health before I could really understand exactly what I wanted.

22 6. My first step was to go by a different name. I used this name for a short time until
23 I eventually legally changed my name to the name I have now. Getting away from my birth name
24 was extremely helpful. My birth name felt like it belonged to someone else. I also began dressing
25 differently and using different pronouns. At one point, I tried using she/her pronouns, but I
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1 quickly realized that didn't feel right either. I went back to they/them pronouns and that felt more
2 like who I am.

3 7. In about mid-summer 2022, I asked my parents about HRT. I had already done
4 massive amounts of research to learn about my options, find out the side effects of each one, and
5 considered what it would mean for me to do these things. I didn't want to rush into a large
6 decision that would have such a big impact monetarily and medically. My parents were
7 receptive, and they went and did their own research. They were very accepting, but they wanted
8 to be informed and understand as much as they could too.

9 8. When I was 16 years old, I began seeing doctors for HRT consultations to figure
10 out what I wanted to do. I started Estradiol about a month after seeing my doctor. After about
11 six months on hormones, I noticed that I was feeling better and more comfortable with myself.
12 I wasn't at my peak yet, but the way I felt had significantly improved. My parents even noticed
13 too. I was happy for the first time in about a year. Even with things that made me feel bad, I
14 found it much easier to accept those things.

15 9. The biggest thing for me was I just felt happy and comfortable with myself. I
16 didn't have to worry about how people would perceive me when I did the things I enjoy doing.
17 I had quit baseball because I didn't want to be seen as so masculine, but I was able to go back
18 after starting hormone therapy. I coached Little League and played on the Junior Varsity baseball
19 team at school. Because I was so comfortable in myself and how I presented, I didn't have to
20 worry so much about being perceived in a way I didn't want to be perceived.

21 10. I understand that last month, President Trump issued an Executive Order that
22 would ban gender-affirming care for anyone under the age of 19. I have felt very angry and
23 frustrated since the Executive Order came out. Trans people are such a small population whose
24 choices don't affect anyone else, and I feel like we are being used as a talking point to get
25 cisgender people to fight with each other.
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1 11. I also don't like that the Executive Order implies I didn't know what I was doing
2 when I started receiving gender-affirming care, like my parents and I hadn't done our research
3 or learned about what would happen to my body after I started taking hormones. I knew I would
4 have side effects and what would happen to my body. I was the one who went to my doctor to
5 ask for hormone therapy.

6 12. I also have to consider a lot more things in my life that cisgender people take for
7 granted. My family was planning a vacation out of the country, and now we don't know if we
8 should go because we don't know if we'll be able to get back into the United States. I am
9 applying to universities because I want to pursue an engineering degree. Unfortunately, I have
10 had to completely eliminate some really great engineering schools because they are in states like
11 Texas, where I could not receive care and would feel unsafe all the time. For those reasons, I've
12 had to confine my searches to states with laws that would allow me to keep receiving HRT and
13 where my family already knows people. No matter how great the school is, I can't go there if I
14 can't get the care I need in the state where the school is located. That means I have fewer
15 opportunities than my cisgender peers.

16 13. If I was unable to receive gender-affirming care like HRT, my mental health
17 would be significantly impacted due to the amount of work it would take to continue presenting
18 as my authentic self. I would become depressed again and I'd feel uncomfortable in my own
19 skin and would be constantly thinking about how I am being perceived. I don't want to be
20 perceived as anyone other than who I am.

21 14. My family, and I personally, can't afford to bring a lawsuit on our own. It would
22 be massively stressful to try to sue the Federal Government to stop this Executive Order on our
23 own. But this issue is so important because without care, there will be a huge increase of suicide
24 in kids who are like me. Gender-affirming care is literally life-saving care. I know that because
25 it saved my life.
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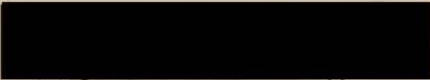

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this ____ day of February 2025 at _____, Washington.
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6 V.S.
7 Non-Binary Youth
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1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 2nd day of February 2025 at Shoreline, Washington.

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5 V.S. 
6 Non-Binary Youth
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